

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF INDIANA
HAMMOND DIVISION AT LAFAYETTE**

In re:

Greg A. LaOrange

Debtor.

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: **Case No.: 12-40420**
: **Chapter 13**
: **Chief Judge Robert E. Grant**
: *****
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MOTION TO APPROVE IMMATERIAL LOAN MODIFICATION AGREEMENT

Comes now, Creditor, U.S. Bank National Association, not in its individual capacity, but solely as Legal Title Trustee for LVS Title Trust I ("Creditor"), by and through its mortgage servicing agent BSI Financial Services Inc, by and through Counsel, and hereby files its Motion to Approve Immaterial Loan Modification Agreement. In support thereof, Creditor states:

1. On December 21, 2012, Debtor filed a request with the Court for Loss Mitigation.
2. Following a loss mitigation review, Creditor offered Debtor a trial modification plan. Debtor properly completed the terms of said trial plan and has now been offered, and accepted, a permanent loan modification agreement, which is attached hereto as Exhibit A.
3. Creditor, Debtor, by Counsel, and the Standing Chapter 13 Trustee have entered into a joint stipulation, outlining the terms of the loan modification agreement.
4. The parties agree that this loan modification agreement is an immaterial modification of the plan as Debtor's Chapter 13 Trustee is set to pay all Creditors in full.
5. As such, Creditor requests that the Court approve the terms of the joint stipulation, without notice on all parties, as the terms are immaterial.

WHEREFORE, Creditor respectfully requests that the Court issue an order approving of the Joint Stipulation Regarding Loss Mitigation Settlement Agreement.

Dated: November 12, 2013

/s/ Sarah E. Willms

Sarah E. Willms (28840-64)

James E. Tebbutt (93510)

Keith Levy (6279243)

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Attorney for Creditor

The case attorney for this file is Sarah E. Willms.

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing Notice of Motion was served on the parties listed below via e-mail notification:

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The below listed parties were served via regular U.S. Mail, postage prepaid on November 12, 2013:

Greg A. LaOrange
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Greg A. LaOrange
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Monticello, IN 47960

/s/ Sarah E. Willms

Sarah E. Willms